MEMORANDUM

TO: Larry E. Moss
Clyde Martin Litton
Albert J. Hill
Ellen Nadean Bissiri
David Green
Jean Koch
Lyal D.Asay
Leslie H. Avery
Ronald Kennedy

FROM: James W. Moorman
Sierra Club Legal Defense Fund

DATE: October 30, 1972

Enclosed are copies of interrogatories filed by the United States in this case. We will be required to answer these interrogatories and, therefore, I will need information from you. Each of you should pay particular attention to interrogatories 1, 2, 11, and interrogatories 13 through 17. I would appreciate it if each of you would send me an answer for each of those interrogatories by November 10.

You should reread your affidavits prior to preparing your answers.

If you have any question about any of these interrogatories before answering them, please give me a telephone call.

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Enclosure

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UNITED STATES DISTRICT COURT FOR THE

NORTHERN DISTRICT OF CALIFORNIA

SIERRA CLUB, a non-profit California corporation, et al., Plaintiffs, v. ROGERS C. B. MORTON, individually and as Secretary of the Interior of the United States, et al., Defendants.	Civil No. 51464 WTS

DEFENDANTS' INTERROGATORIES TO PLAINTIFFS

TO: Plaintiffs SIERRA CLUB, LARRY E. MOSS, CLYDE MARTIN LITTON, ALBERT J. HILL, ELLEN NADEAN BISSIRI, DAVID GREEN, JEAN KOCH, LYAL D. ASAY, LESLIE AVERY and RONALD KENNEDY, individuals, and MINERAL KING DISTRICT ASSOCIATION, an unincorporated association, and their attorneys, JAMES MOORMAN, JOHN HOFFMAN, and BARRY FISHER of SIERRA CLUB LEGAL DEFENSE FUND, INC., and LELAND R. SELNA, JR., of FELDMAN, WALDMAN & KLINE:

Defendants request that the above-named plaintiffs answer under oath, pursuant to Rule 33 of the Federal Rules of Civil Procedure, the following interrogatories:

(NOTE: In answering the interrogatories, furnish such information as is available to you, not merely such information as you know of your own knowledge. This means for you to furnish information which is in the possession of your attorneys, agents and advisers.)

1. What are the business and residential addresses of the following named plaintiffs?

(a) Larry E. Moss

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(b) Clyde Martin Litton

(c) Albert J. Hill

(d) Ellen Nadean Bissiri

(e) David Green

(f) Jean Koch

(g) Lyal D. Asay

(h) Leslie Avery

(i) Ronald Kennedy

2. As to each of the foregoing plaintiffs named in Interrogatory No. 1 above, please state the following:

(a) The address and location of their summer residence in the Mineral King Valley.

(b) The time periods which said plaintiffs occupied their summer residence in the Mineral King Valley.

(c) The nature of their legal right by which they occupy the said summer residences:

(1) If by grant deed, please state the deed date, book volume, page number and date and place of recording.

(2) If occupancy is by lease, please state the date of and term of the original lease as well as any assignments and/or renewals thereof.

3. What are the names and addresses of all the members of plaintiff, Mineral King District Association?

4. What is the address of plaintiff, Mineral King District Association?

5. What is the date of the formation of plaintiff, Mineral King District Association?

6. Please state the names of the officers and/or the directors of the Mineral King District Association.

7. Please list the location and address and owner of each of the cabins in the Mineral King Valley and vicinity owned by the members of plaintiff, Mineral King District Association.

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8. Please state the total number of dues paying members of plaintiff, Sierra Club.

9. Please state the total number of dues paying members of plaintiff, Sierra Club, who reside in California.

10. Please state the total number of dues paying members of plaintiff, Sierra Club, who reside in the Mineral King Valley.

(11.) Please state the dates, number of members and precise nature and location of each activity conducted and/or sponsored by plaintiffs in the Mineral King area for the past fifteen (15) years.

12. What are the names, business and residential addresses of the officers and directors of plaintiff, Sierra Club?

(13.) Have plaintiffs retained, contracted with or received by gratuity, any wildlife, fish, scientific, ecological and environmental consultant, contractor, engineer or anyone else to make a survey, study, investigation and/or report with respect to the Mineral King Valley, including but not limited to the Sequoia National Game Refuge, Sequoia National Park and the proposed recreational development of Walt Disney Productions therein?

(14.) If your answer to Interrogatory No. 13 is in the affirmative, please list the name and address of each person making each said survey, study, investigation and/or report and the nature thereof; the dates of commencement and termination of each said survey, study, investigation and/or report.

(15.) If the survey, study, investigation and report has been reduced to writing, list its title and the person or persons with addresses who have custody thereof.

(16.) Do plaintiffs have, from whatever source, any survey, study, investigation and/or report concerning wildlife, fish, ecology and environment insofar as it or they relate to the Mineral King Valley, Sequoia National Park, Sequoia National

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Game Refuge?

17. If your answer to Interrogatory No. 16 is in the affirmative, please list the following as to each said survey, study, investigation and report:

(a) The title(s) thereof.

(b) The name and address of the person or persons who participated therein.

(c) The name and address of the person or persons having custody thereof.

DATED: October 24, 1972.

JAMES L. BROWNING, JR.
United States Attorney

RODNEY H. HAMBLIN
Assistant United States Attorney

PAUL E. LOCKE
Assistant United States Attorney

By PAUL E. LOCKE
PAUL E. LOCKE

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